

UNITED STATES DISTRICT COURT
for the
Middle District of Tennessee

United States of America
v.

Sajju Khatiwada

Case No. 24-mj-1277

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 11, 2024 and April 16, 2024 in the county of Davidson in the
Middle District of Tennessee, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 1343

Wire Fraud

18 U.S.C. 1957

Money Laundering

This criminal complaint is based on these facts:

See Attached statement in support of complaint

☒ Continued on the attached sheet.

/s/ Joy Wright

Complainant's signature

FBI Special Agent Joy Wright

Printed name and title

Sworn to me remotely by telephone, in compliance with
Fed. R. Crim. P. 4.1.

Date: November 8, 2024

Barbara D. Holmes
Judge's signature



City and state: Nashville, Tennessee

U.S. Magistrate Judge Barbara D. Holmes

Printed name and title

STATEMENT IN SUPPORT OF CRIMINAL COMPLAINT

I, Joy C. Wright, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a complaint charging SAJJU KHATIWADA with a scheme to defraud Bridgestone, in violation of 18 U.S.C. § 1343 (wire fraud), and money laundering, in violation of 18 U.S.C. § 1957.

2. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been since July 2005. As a Special Agent, I have had training and experience in investigating and prosecuting public corruption and complex financial crimes. I have executed and have assisted other agents in the execution of search warrants, including for information associated with email, in investigations related to wire fraud, mail fraud, and other complex financial crimes. As a federal agent, I am authorized to investigate violations of laws of the United States.

3. As a result of my training, prior experience, previous cases with which I have been involved, and my working with other municipal, state, and federal agents I have become familiar with the statutes and case law concerning wire and mail fraud which can be prosecuted in a court of the United States. I am currently participating in an investigation being conducted by the FBI.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show simply that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

5. Based on my training and experience and the facts set forth in this affidavit, there is probable cause to believe that Sajju Khatiwada and others have committed violations of Title 18, United States Code, Section 1343 (Wire Fraud) and Title 18, United States Code, Section 1957

(money laundering). Wire fraud requires the government to prove: (1) that the defendant knowingly participated in, devised, or intended to devise a scheme to defraud in order to deprive another of money or property; (2) that the scheme included a material misrepresentation or concealment of a material fact; (3) that the defendant had the intent to defraud; and (4) that the defendant used the interstate wires in furtherance of the scheme. *See* 18 U.S.C. § 1343. Money laundering requires the government to prove: (1) that the defendant knowingly engaged in a monetary transaction; (2) that the monetary transaction was in property derived from specified unlawful activity; (3) that the property had a value greater than \$10,000; (4) that the defendant knew that the transaction was in criminally derived property; and (5) that the monetary transaction took place within the United States. *See* 18 U.S.C. § 1957.

6. I have not included details of every aspect of the investigation, but rather only those pertinent to this warrant application. Nor am I requesting that the Court rely on any facts not set forth herein.

PROBABLE CAUSE

Background

7. The FBI is investigating Sajju Khatiwada, also known as Saj Khatiwada, for conducting a scheme to defraud in which fraudulent invoices were submitted to his employer, Bridgestone Americas Inc., for payment to Khatiwada's own benefit in the amount of approximately \$15 million.

8. Bridgestone Americas, Inc. ("Bridgestone") is the North American Subsidiary of Bridgestone Corporation, which is the world's largest tire and rubber company. Bridgestone's corporate headquarters is located in Nashville, Tennessee.

9. Khatiwada was an employee of Bridgestone from April 2016 until April 2024 and was employed at the Bridgestone Tower, Nashville, Tennessee location. Khatiwada began as the Director of Treasury Operation and Cash Management, progressed to the Director, Cash Management, Treasury Consulting and M&A, and was Assistant Treasurer, Capital Planning and Funding upon separation from Bridgestone in the Treasury Operations Department. Khatiwada's job responsibilities included being the relationship lead for Chase Paymentech and card brands.

10. Khatiwada was born in Nepal and is currently a permanent U.S. resident. Khatiwada's spouse is [REDACTED]. Both are current residents of Franklin, Tennessee.

The Investigation

11. In June 2024, the FBI began this investigation after participating in a meeting with Bridgestone General Counsel, Bridgestone Outside Counsel, and Bridgestone employee [REDACTED], in which allegations were laid out against Khatiwada and his misuse of his position with Bridgestone to enrich himself through fraud. [REDACTED] is an employee who worked with Khatiwada at the Nashville, Tennessee Bridgestone location. During this on-going investigation, I have conducted interviews, reviewed internal documents provided by Bridgestone, including emails, invoices, and personnel records, and reviewed records obtained in response to Federal Grand Jury subpoenas, including bank records.

12. On June 13, 2024, and again on August 28, 2024, I interviewed [REDACTED] who explained that Khatiwada had been submitting fraudulent monthly invoices to Bridgestone using a fictitious vendor called Paymt-Tech, LLC. The fraud had occurred from August 2020 until April 2024. The fraud was discovered after Khatiwada voluntarily left employment with Bridgestone in April 2024.

13. In Khatiwada's role, he was responsible for managing the relationship with the banks that provided the credit card processing services at each of the retail Bridgestone locations across the United States. In his role of managing this relationship, he acted as a liaison with bank representatives and initiated payments for bank fees and credit card processing fees. The process of paying this invoice was bundled with the bank fees and not unusual since Khatiwada managed the credit card piece of the business. At the time of these invoices, it was believed that Bridgestone paid these fees in aggregate, meaning as a lump sum of fees each month, versus paying a percentage fee per transaction, which would take place at the time of the purchase. [REDACTED] explained that within Khatiwada's role, it was not out of the ordinary for Khatiwada to initiate payments to the vendors for credit card processing fees.

14. In March 2024 and prior to leaving the company, Khatiwada told [REDACTED] and others that the Paymt-Tech fees would no longer be invoiced in aggregate, and that going forward the fees would be paid by a per purchase percentage at the point of purchase. However, as explained further below, there is probable cause to believe that this explanation was false, and that Paymt-Tech was never a legitimate vendor.

15. [REDACTED] explained that each month Khatiwada sent an email from his Bridgestone email account: khatiwadasaj@bfusa.com, to the members of the Treasury Operations team to initiate a payment to a vendor called Paymt-Tech, LLC for the monthly bank fees. The email would contain an PDF invoice document and would request payment of the invoice. Members of the Treasury Operation team approved payment of this invoice believing it was for true bank fees that had been incurred by Bridgestone for that month. [REDACTED] explained that there is a legitimate Chase PaymentTech vendor, which is a payment processing entity owned by J.P. Morgan Chase Bank.

Due to the name similarity, [REDACTED] believed the payments were being made to the J.P. Morgan Chase Bank entity.

16. Bridgestone provided me with copies of numerous internal emails that were received by Bridgestone employees from Khatiwada at khatiwadasaj@bfusa.com. These emails demonstrated the system by which these invoices were paid. Emails sent from khatiwadasaj@bfusa.com and received by other employees at Bridgestone showed that Khatiwada had directed the creation of the Paymt-Tech payment template in the Bridgestone payment system. Emails showed that Khatiwada sent a monthly email to the Treasury Operations team to initiate payment for the monthly invoices attached to the emails.

Email Examples:

17. I reviewed the following emails, among others:

18. An email string with dates between August 25, 2020, through August 27, 2020, between Khatiwada, using khatiwadasaj@bfusa.com and [REDACTED] an employee who worked at the Nashville, Tennessee Bridgestone location. In this email string, Khatiwada instructed T.S.: “[REDACTED] please create a Reval Payments template to pay the attached Paymt-Tech invoice.” Khatiwada used khatiwadasaj@bfusa.com to send a follow-up email stating, “Template approved” and further emailed “Let’s plan to pay this today”. Attached to this email was a PDF document named “Paymt-Tech LLC Invoice June 30 2020.pdf.” A review of this attached document shows an invoice dated June 30, 2020, in the amount of \$69,845.49 for “Service Charges – June 1 2020 to June 30 2020,” purportedly from Paymt-Tech LLC located at 500 N. Rainbow Blvd, Las Vegas, NV 89107. The Bank Account Number listed for remittance was BB&T Bank account number ending x8378.

19. An email dated May 15, 2022, from Saj Khatiwada, using khatiwadasaj@bfusa.com, to members of the Treasury team [REDACTED] and [REDACTED], who both worked at the Nashville, Tennessee

Bridgestone location. The email had the Subject: “April Fees” and stated “[REDACTED]”, see attached for April 2022 credit card fees. Fees are due by middle of month, 5/15 – please send me a note, when released. Regards, Saj.” Attached to this email was a PDF document titled “Paymt-Tech LLC Invoice April 30, 2022.pdf.” A review of this attached document shows an invoice dated April 30, 2022, in the amount of \$298,471.42 for “Service Charges – April 1 2022 to April 30 2022,” purportedly from Paymt-Tech LLC located at 500 N. Rainbow Blvd, Las Vegas, NV 89107. The Bank Account Number listed for remittance was Bank of America account number ending x4326.

20. An email dated August 11, 2022, from Saj Khatiwada, using khatiwadasaj@bfusa.com, to members of the Treasury team, [REDACTED] and [REDACTED] with the Subject “July Fees,” and stating in the body of the email, “[REDACTED]”, see attached for July 2022 credit card fees. Fees are due by middle of month, 8/15 – please send me a note, when released. Regards, Saj.” Attached to this email was a PDF document named “Paymt-Tech LLC Invoice July 31, 2022.pdf.” A review of this attached document shows an invoice dated July 31, 2022, in the amount of \$317,077.86 for “Service Charges – July 1 2022 to July 31 2022,” purportedly from Paymt-Tech LLC located at 500 N. Rainbow Blvd, Las Vegas, NV 89107. The Bank Account Number listed for remittance was Bank of America account number ending x4326.

21. An email dated June 12, 2023, from Saj Khatiwada, using khatiwadasaj@bfusa.com, to members of the Treasury team including [REDACTED] with the Subject, “May Fees” and stating in the body of the email, “[REDACTED]”, see attached for May 2023 credit card fees. Fees are due by middle of month, 6/15 (or earlier business day if 15th falls on a weekend or bank holiday) – please send me a note, when released. Regards, Saj.” Attached to this email was a PDF document named “Paymt-Tech LLC Invoice May 31, 2023.pdf.” A review of this attached document shows an invoice dated May 31, 2023, in the amount of \$434,907.96 for “Service Charges – May 1 2023 to May 31 2023,”

purportedly from Paymt-Tech LLC located at 500 N. Rainbow Blvd, Las Vegas, NV 89107. The Bank Account Number listed for remittance was Bank of America account number ending x4326 .

22. An email dated **April 11, 2024**, from Saj Khatiwada, using khatiwadasaj@bfusa.com” to members of the Treasury team including [REDACTED] with the Subject, “March Fees” and stating in the body of the email, “[REDACTED] see attached for March 2024 credit card fees. Fees are due by middle of month, 4/15 (or earlier business day if 15th falls on a weekend or bank holiday) – please send me a note, when released. Per my discussion with Sam earlier this week, this will be the last invoice (will be debited at transaction level going forward). Regards, Saj.” Attached to this email was a PDF document named “Paymt-Tech LLC Invoice March 31, 2024.pdf.” A review of this attached document shows an invoice dated March 31, 2024, in the amount of \$479,813.57 for “Service Charges – March 1 2024 to March 31 2024” from Paymt-Tech LLC located at 500 N. Rainbow Blvd, Las Vegas, NV 89107. The Bank Account Number listed for remittance was Bank of America account number ending x4326.

Discovery of the Fraud

23. Approximately two months after Khatiwada left Bridgestone’s employment, Bridgestone Accounting Department personnel approached [REDACTED] with questions regarding the significant decrease in monthly bank fees being paid by Bridgestone. Believing it to be related to the Paymt-Tech LLC invoices, [REDACTED] called Bridgestone’s Account Representative at the J.P. Morgan Chase Entity, Chase Paymentech, and inquired as to the change in the amount of fees and also questioned one of the invoices purportedly from Paymt-Tech LLC that had been sent by Khatiwada using khatiwadasaj@bfusa.com. The representative explained that the process had not changed and that Chase Paymentech had never sent invoices to Bridgestone for bank fees because these fees occurred at the Point of Sale. [REDACTED] began to review the Paymt-Tech LLC invoices that

Khatiwada had submitted to Bridgestone using khatiwadasaj@bfusa.com, as well as other documents. [REDACTED] became concerned and referred this information to the Bridgestone Security Team.

24. The Bridgestone Security team began to conduct an internal investigation regarding the payment of these monthly invoices and the entity Paymt-Tech, LLC. The Bridgestone Security team identified Paymt-Tech, LLC as a Nevada LLC with a registered agent as [REDACTED]. This information was provided to the FBI as part of the investigation referral.

25. I conducted a business search of the Nevada Secretary of State website, which listed a Nevada Limited Liability Corporation formed on July 27, 2020 with the name Paymt-Tech, LLC with a managing member as [REDACTED], address of [REDACTED], TN. A review of Tennessee Driver's license pulled from the Tennessee Department of Motor Vehicles shows that a [REDACTED], Date of Birth [REDACTED], is listed with an address of [REDACTED] TN.

Payment of Invoices to Paymt-Tech, LLC via wire transfer from Bridgestone

26. On September 12, 2024, I reviewed numerous internal documents provided by the General Counsel of Bridgestone, including a spreadsheet created by [REDACTED] which listed each payment of a monthly invoice by Bridgestone to Paymt-Tech, LLC. The total number of invoices paid was 47 invoices with a total amount paid of \$14,923,978.57. The invoice payments made by Bridgestone to Paymt-Tech, LLC were paid to either BB&T Bank account number ending x8378 (now Truist Bank) during the dates 8/27/2020-10/15/2021 or a Bank of America bank account number ending x4326 during the dates 11/22/2021-4/11/2024.

27. The following payments were listed on the spreadsheet and match the invoices attached to above-described emails sent from khatiwadasaj@bfusa.com to the Treasury Operations Team for payment via wire transfers:

| Value Date | Amount | Final Party Bank |
|------------|--------------|------------------|
| 8/27/2020 | \$69,845.49 | BB&T |
| 5/16/2022 | \$298,471.42 | Bank of America |
| 8/15/2022 | \$317,077.86 | Bank of America |
| 6/15/2023 | \$434,907.96 | Bank of America |
| 4/15/2024 | \$479,813.57 | Bank of America |

Wire Transfers from Bridgestone to Paymnt-Tech, LLC Bank Accounts

28. On September 12, 2024, I reviewed bank account documents for BB&T bank account number ending x8378 provided by Truist Bank in response to a Federal Grand Jury subpoena for records. These records show that the account was opened on August 25, 2020, in the name of Paymt-Tech LLC, address [REDACTED], TN. The signature card shows the account holder as [REDACTED]-CEO. The signature card listed Telephone number [REDACTED]. A Federal Grand Jury subpoena served on Google VOIP listed the email recovery account for this Voice Over IP number as paymt.tech.llc@gmail.com as the recovery email for the telephone number. A secondary account listed as connected to this phone number is sajju.khatiwada@gmail.com. The email sajju.khatiwada@gmail.com is the same email that Khatiwada lists on numerous personnel documents during his employment with Bridgestone.

29. A review of these records shows 17 wire transfers from Bridgestone Americas into the BB&T bank account number ending x8378 totaling \$3,413,472.00. These wire transfers match to the above noted spreadsheet provided by Bridgestone Americas. Specifically, the bank account received a wire transfer from Bridgestone Americas in the amount of \$69,845.49 on August 27, 2020, which ties to the amount listed as paid by Bridgestone in their above-mentioned spreadsheet.

The 17 wire transfers from Bridgestone were the only deposits made into the account for the entirety of the account being opened.

30. On September 17, 2024, I reviewed bank account documents for Bank of America bank account number ending x4326 provided by Bank of America in response to a Federal Grand Jury subpoena for records. These records show that the account was opened on November 18, 2021, in the name of Paymt-Tech LLC, address 725 Frodo Lane, Antioch, TN. The signature card shows the account holder as “[REDACTED].”

31. A review of these records shows 30 wire transfers from Bridgestone Americas into the Bank of America bank account number ending x4326 totaling \$11,510,506.57 that match to the above noted spreadsheet provided by Bridgestone Americas. The following four wires were made into the account by Bridgestone Americas: May 16, 2022 in the amount of \$298,471.42, August 15, 2022 in the amount of \$317,077.86, June 15, 2023 in the amount of \$434,907.96, and April 14, 2024 in the amount of \$479,813.57. Each of these wire transfers corresponds to the amount listed as paid by Bridgestone on those dates in the above-mentioned spreadsheet prepared by [REDACTED] Wires from Bridgestone were the only deposits made into the account for the entirety of the account being opened.

32. The total amount paid from Bridgestone to Paymt-Tech, LLC into the BB&T and Bank of America Bank accounts was \$14,923,978.57.

Wires/ACHs from Paymt-Tech, LLC to Bank Accounts in the Name of Sarmita Tuldahar

33. A further review of the bank records for BB&T account x8378 shows that from September 2, 2020 through October 15, 2021, approximately 48 wires transfers and ACHs were made to an Ally Bank account number ending in x0659 in the name of [REDACTED], known to me to be the wife of Sajju Khatiwada. The transfers were made within days of receiving the wire

transfers from Bridgestone Americas. Some wires were labeled as “Consulting services.” The total of these transfers to Ally Bank account ending in x0659 in [REDACTED]’s name was \$3,409,776.98. There was minimal other activity in account x8378 with transactions consisting mostly of bank fees, etc.

34. A further review of the bank records for account x4326 shows that from December 3, 2021 through April 15, 2024, approximately 60 wires transfers and ACHs were made to an Ally Bank account number ending in x2423 in the name of [REDACTED], known to me to be the wife of Sajju Khatiwada. The transfers were made on the same day or within days of receiving the wire transfers from Bridgestone Americas. Some wires were labelled as “Monthly Service Fees, Other Expenses,” etc. The total of these transfers to Ally Bank account ending in x2423 in [REDACTED]’s name was \$11,505,163.57. There was minimal other activity in account x4326 with transactions consisting mostly of bank fees, etc.

35. The total of funds paid from Paymt-Tech, LLC bank accounts to [REDACTED] bank accounts x0659 and x2423 was \$14,914,940.55.

Internal Ally Bank Transfers from [REDACTED]’s Sole Bank Accounts to Joint Bank Account

36. On September 12, 2024, I reviewed bank account documents for bank accounts ending in x0659 and x2423 provided by Ally Bank in response to a Federal Grand Jury subpoena for records. Both of these accounts are bank accounts solely in the name of [REDACTED].

37. A review of bank account ending in 0659 from August 20, 2020 through November 18, 2021 shows that after each payment was received into the account from Paymt Tech, LLC, a large transfer was then made out of the account and into an Ally account ending in x6016 which is a joint account held in the name of Sajju Khatiwada and [REDACTED] (the “Joint Account”). The first wire transfer from Paymt Tech LLC to this account was received on September 2, 2020,

in the amount of \$68,500.00. On that same day, \$68,500 was moved to the x6016 joint bank account. The last wire transfer from Paymt Tech LLC to this account was made on October 15, 2021, in the amount of \$297,375.00. As with the established pattern in the account, on that same day, October 15, 2021, \$291,600.00 was moved to the x6016 Joint Account.

38. A review of bank account ending in x2423 from December 6, 2021 through April 16, 2024 shows that after each payment was received into the account from Paymt Tech, LLC, a large transfer was then made out of the account and into the Joint Account ending x6016. The first wire transfer from Paymt Tech, LLC to this account was received on December 6, 2021, in the amount of \$150,000. On that same day, \$150,000 was transferred to the x6016 joint bank account. The last wire transfers from Paymt Tech, LLC to this account was received on April 16, 2024, in the amount of \$150,000. On that same day, \$150,008.62 was transferred to the x6016 Joint Account. The balance of the x2423 account was zeroed and subsequently closed. Khatiwada's termination date with Bridgestone was April 14, 2024.

39. The total of the funds paid from [REDACTED] sole bank accounts of x0659 and x2423 to the x6016 Joint Account is \$14,715,501.43.

*Internal Ally Bank Transfers from Khatiwada and
[REDACTED] Joint Account to Khatiwada's Sole Account*

40. A review of the Joint Account x6016 for the time period of September 2, 2020 through April 22, 2024 shows a total of \$14,715,424.73 in transfers to Ally Bank account number ending in x1975. There are 95 total wires transfers that follow the pattern of receiving an amount from the Joint Account x6016 and then wiring the exact same amount to the Ally account number ending x1975 (Khatiwada Sole Account) on that same day. For example, on September 2, 2020 \$68,500 was wired from x0659 to x6016 (the Joint Account) and that same day \$68,500 was wired

from x6016 (the Joint Account) to x1975 (Khatiwada Sole Account). On **April 16, 2024** \$150,008.62 was wired from x2423 to x6016 (the Joint Account) and that same day \$150,008.62 was wired from x6016 (the Joint Account) to x1975(Khatiwada Sole Account).

41. I have probable cause to believe that Khatiwada utilized interstate wires, in violation of 18 U.S.C. § 1343, to send emails containing false invoices to the Treasury Team located in the Nashville, Tennessee area. Since the Microsoft servers are located in Washington State and elsewhere, Khatiwada utilized khatiwadasaj@bfusa.com and electronically transmitted false documents via interstate wire via Microsoft servers in Washington or elsewhere to S.G. and others in Nashville, Tennessee.

42. I further have probable cause to believe that Khatiwada engaged in money laundering when he transferred proceeds of the wire fraud scheme on April 16, 2024 from x6016 (the Joint Account) to x1975 (Khatiwada Sole Account).